

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 05-10067-PBS
)	
TALMUS R. TAYLOR)	
)	
Defendant.)	
)	

JOINT MOTION FOR EXCLUDABLE DELAY

Pursuant to this Court's Report and Order on Initial Status Conference, dated June 30, 2005, and the Court's oral request at the Interim Status Conference held on July 26, 2005, the parties jointly move that the Court exclude the following periods of time under the Speedy Trial Act:

1. April 27, 2005 through May 25, 2005. This period is excludable pursuant to Local Rule 112.2(A)(2) and 18 U.S.C. § 3161(h)(8)(A) as the period of time within which the government made automatic disclosures. [28 days];
2. June 2, 2005 through June 14, 2005. This period is excludable pursuant to 18 U.S.C. § 3161(h)(1)(F) and 18 U.S.C. § 3161(h)(8)(A) due to defendant's retention of new counsel and his resulting motion to continue the initial status conference from June 2 to June 15; [12 days];
3. June 15, 2005. This period is excludable due to in-court proceedings involving the case (Initial Status Conference). [1 day].
4. June 16, 2005 through July 25, 2005. This period is excludable pursuant to 18 U.S.C. § 3161(h)(8)(A) to permit defense counsel time to review the government's automatic discovery. [40 days].
5. July 26, 2005. This period is excludable due to in-court proceedings involving the case (Interim Status Conference). [1 day].
6. July 27, 2005 through September 12, 2005. This period is excludable pursuant to

18 U.S.C. § 3161(h)(8)(A) to enable the government to respond to defendant's request for additional discovery and to permit defense counsel time to review that additional discovery. [48 days].

With the foregoing exclusions, the parties calculate that seven days of non-excludable time have elapsed under the Speedy Trial Act.

TALMUS TAYLOR

MICHAEL J. SULLIVAN

By his attorney,

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Date: July 28, 2005